BOHM LAW GROUP, INC.
4600 NORTHGATE BOULEVARD, SUITE 210
SACRAMENTO, CALIFORNIA 95834

EXHIBIT B

STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency GOVERNOR EDMUND G. BROWN JR.

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING DIRECTOR KEVIN KISH

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | TDD 800-700-2320
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

March 17, 2015

RE: **Notice of Filing of Discrimination Complaint**
DFEH Matter Number: 508769-150764
Right to Sue: Zhang / MPI Research, Inc.

To All Respondent(s):

Enclosed is a copy of a complaint of discrimination that has been filed with the Department of Fair Employment and Housing (DFEH) in accordance with Government Code section 12960. This constitutes service of the complaint pursuant to Government Code section 12962. The complainant has requested an authorization to file a lawsuit. This case is not being investigated by DFEH and is being closed immediately. A copy of the Notice of Case Closure and Right to Sue is enclosed for your records.

Please refer to the attached complaint for a list of all respondent(s) and their contact information.

No response to DFEH is requested or required.

Sincerely,

Department of Fair Employment and Housing

STATE OF CALIFORNIA | Bus... , Consumer Services and Housing Agency GOVERNOR EDMUND G. BROWN JR.

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING DIRECTOR KEVIN KISH

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March 17, 2015

Shuang Zhang
1145 Blair Ave.
Sunnyvale California 94087

RE: **Notice of Case Closure and Right to Sue**
DFEH Matter Number: 508769-150764
Right to Sue: Zhang / MPI Research, Inc.

Dear Shuang Zhang,

This letter informs you that the above-referenced complaint was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective March 17, 2015 because an immediate Right to Sue notice was requested. DFEH will take no further action on the complaint.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

To obtain a federal Right to Sue notice, you must visit the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this DFEH Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Department of Fair Employment and Housing

STATE OF CALIFORNIA | Bus... ..s, Consumer Services and Housing Agency GOVERNOR EDMUND G. BROWN JR.
DEPARTMENT OF FAIR EMPLOYMENT & HOUSING DIRECTOR KEVIN KISH
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Enclosures

cc: Wililam Parfet

MPI Research, Inc.

COMPLAINT OF EMPLOYMENT DISCRIMINATION

BEFORE THE STATE OF CALIFORNIA

DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING

Under the California Fair Employment and Housing Act
(Gov. Code, § 12900 et seq.)

In the Matter of the Complaint of
Shuang Zhang, Complainant.
1145 Blair Ave.
Sunnyvale California 94087

DFEH No. 508769-150764

vs.

MPI Research, Inc. Respondent.
54943 North Main Street
Mattawan, Michigan 49071

Complainant alleges:

1. Respondent **MPI Research, Inc.** is a subject to suit under the California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.). Complainant believes respondent is subject to the FEHA.

2. On or around **March 24, 2014**, complainant alleges that respondent took the following adverse actions against complainant: **Harassment, Retaliation Denied a work environment free of discrimination and/or retaliation, Terminated,** . Complainant believes respondent committed these actions because of their: **Sex-Gender** .

3. Complainant **Shuang Zhang** resides in the City of **Sunnyvale**, State of **California**. If complaint includes co-respondents please see below.

Co-Respondents:

Wililam Parfet
54943 North Main Street
Mattawan Michigan 49071

MPI Research, Inc.

1145 Blair Ave.
Sunnyvale California 94087

Additional Complaint Details:

I was subjected to sexual harassment by William Parfet, the Chairman and Chief Executive Officer at MPI Research, Inc. This was a continuing violation of sexual harassment that began in 2008 and continued until in or about June of 2014. After I rejected his sexual advances, I was terminated in September of 2014.

VERIFICATION

I, **Shuang Zhang**, am the Complainant in the above-entitled complaint. I have read the foregoing complaint and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein alleged on information and belief, and as to those matters, I believe it to be true.

On March 17, 2015, I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Sunnyvale, CA
Shuang Zhang